

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
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INFORMATION
DATE FILED: MAY 19 2008

UNITED STATES OF AMERICA

v.

YULIN WU,
a/k/a "Ah B,"

Defendant.

08 CRIM 441

COUNT ONE

The United States Attorney charges:

1. From at least in or about November 2007, up to and including at least in or about March 2008, in the Southern District of New York and elsewhere, YULIN WU, a/k/a "Ah B," the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that YULIN WU, a/k/a "Ah B," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of 3,4-Methylenedioxymethamphetamine (MDMA), which is commonly known as "ecstasy," in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

JUDGE KEENE

FORFEITURE ALLEGATION

3. As a result of committing the controlled substance offense alleged in Count One of this Information, YULIN WU, a/k/a "Ah B," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Information.

Substitute Asset Provision

4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant -

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value;
or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant

up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
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a/k/a "Ah B,"

Defendant.

INFORMATION

08 Cr. ____

(Title 21, United States Code, Section
846)

MICHAEL J. GARCIA
United States Attorney.

5-19-08 (WR): Filed Information and Waiver of Indictment.
Deft. present with atty. Henry Steinglass and Cantonese
Interpreter. AUSA Jenna Dabbs present. Deft. pleads
Not guilty. Next Conference: 6-23-08 at 2:30 pm
T/E between 5-19-08 and 6-23-08. Deft. detained.
Keenan, J.